

# BEAD OFFICIAL RECORD

6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D.C., 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

JUN 16 2005

## MEMORANDUM

**SUBJECT:** BEAD Response to Selected Sulfuryl fluoride (ProFume™) Comments  
Submitted By the Fluoride Action Network Pesticide Project (D 316797)

**FROM:** Jonathan Becker, Senior Science Advisor  
William Chism, Senior Agronomist  
Colwell Cook, Entomologist  
Biological Analysis Branch  
Biological and Economic Analysis Division (7503C)

A handwritten signature in black ink, appearing to read "Jon Becker", is written over the "FROM" section.

**THRU:** Arnet Jones, Chief  
Biological Analysis Branch  
Biological and Economic Analysis Division (7503C)

A handwritten signature in black ink, appearing to read "Arnet Jones", is written over the "THRU" section, followed by the date "06/14/2005".

**TO:** Daniel Kenny  
Insecticide and Rodenticide Branch  
Registration Division (7505C)

Peer Review Date: May 25, 2005

## **PURPOSE:**

The Registration Division (RD) asked the Biological and Economic Analysis Division (BEAD) to answer four comments submitted by the Fluoride Action Network (FAN) dated April 19, 2005 in response to the Dow AgroSciences petition to establish sulfuryl fluoride tolerances for a number of new raw and processed foods.

## **QUESTIONS AND ANSWERS:**

**3.3.3 Dow states, "Most of the finished food products were fumigated in their retail packaging." What is the estimated quantity of the packaging to be fumigated with sulfuryl fluoride on a yearly basis?**

Sulfuryl fluoride is intended to be used as a methyl bromide alternative that is used to target pests in commodities and food processing facilities. Based on information received by applications for methyl bromide critical uses exemptions, discussions with the manufacturer of sulfuryl fluoride, food processors, and university researchers BEAD has estimated that approximately 1 percent of processed foods could be fumigated with methyl bromide per year.

Handwritten initials in black ink, possibly "ch" or "chm", are located in the bottom left corner of the page.

Therefore, BEAD believes that 1 percent of processed foods is the upper bound of what could be fumigated with sulfuryl fluoride. This is estimated using the following assumptions:

- Most food processing plants strive to operate continuously (year round, 24 hours per day, seven days a week). Some production down-time occurs because of equipment maintenance and repair and fumigations, so we assume that 300 days of production occurs annually.
- An average of 2.5 fumigations occurs in each facility during the year. These fumigations are usually timed to take place over holiday weekends.
- If we assume 3 fumigations occur for every 300 days of production, we estimate that 1 percent of the annual production will be fumigated.

This estimate includes food exposed while in the food processing facility as well as packaged food products stored within the same facility.

### **3.3.4 What percentage of this packaging will be incinerated on a yearly basis?**

BEAD has no knowledge of the amount of food packing that is incinerated every year. However, a maximum of about 1% of packaging would be possibly fumigated. EPA's Office of Solid Waste may have information on the components within various industrials and household wastestreams and their ultimate destinations.

### **3.4 Are there any circumstances that EPA knows of when food commodities can be fumigated more than once with sulfuryl fluoride? If so, would EPA please explain.**

A second fumigation may take place due to a pest infestation at a regional distribution warehouse. BEAD has estimated above that approximately 1 percent of processed foods could be fumigated once, based on information from applications for methyl bromide critical uses exemptions, discussions with the manufacturer of sulfuryl fluoride, food processors, and university researchers. This estimate includes food exposed while in the food processing facility as well as packaged food products. In addition, BEAD estimates that 0.0005% of processed foods in packages could be fumigated twice (about 5% of 1% fumigated products could be fumigated twice or 0.0005% of foods). In the case of a distribution warehouse only the suspected products would be removed to a trailer for targeted fumigation. Other chemicals may be used for these fumigations.

Cocoa beans imported into the United States are usually fumigated twice, once before shipment and a second time in the port of entry warehouses before being sent to the customer.

### **3.11 Would EPA please explain to the public why sulfuryl fluoride will not be an ozone depleter. Also, will EPA make accessible the atmospheric test protocol for sulfuryl fluoride.**

BEAD is not involved in the determination of ozone depleting potential. Please refer to the EPA websites: <http://www.epa.gov/docs/ozone/ods.html> for a list of ozone depleting substances and to <http://www.epa.gov/docs/ozone/index.html> for more information about ozone depletion.

**DATA PACKAGE BEAN SHEET**

Date: 20-Jun-2005

Page 1 of 1

**\*\*\* Registration Information \*\*\***

Registration: 3F6573 -

Company: 62719 - DOW AGROSCIENCES LLC

Risk Manager: RM 01 - Daniel Kenny - (703) 305-7546 Room# CM-2 229

Risk Manager Reviewer: Daniel Kenny DKENNY

Sent Date: 10-Apr-2003

Calculated Due Date: 27-Nov-2003

Edited Due Date:

Type of Registration: Tolerance Petition

Action Desc: (230) F PETITION;RAW AGRICULTURAL COMMODITY;

Ingredients: 078003, Sulfuryl fluoride

**\*\*\* Data Package Information \*\*\***Expedite: Yes ☒ No

Date Sent: 11-May-2005

Due Back:

DP Ingredient: 078003, Sulfuryl fluoride

DP Title: Profume - Comments to Notice of Filing

CSF Included: Yes ☒ NoLabel Included: Yes ☒ No

Parent DP #:

**Assigned To****Date In****Date Out**

Organization: BEAD / HIB

12-May-2005

14-Jun-2005

Last Possible Science Due Date: 20-Jun-2003

Team Name:

Science Due Date:

Reviewer Name: Chism, William

12-May-2005

14-Jun-2005

Sub-Data Package Due Date:

Contractor Name:

**\*\*\* Studies Sent for Review \*\*\*****\*\*\* Additional Data Package for this Decision \*\*\*****\*\*\* Data Package Instructions \*\*\***

Attn: Bill Chism/Jonathan Becker

Attached is a printed copy of FAN's comments and objections to the Notice of Filing for sulfuryl fluoride on food handling establishments. I have highlighted the comments that we need BEAD's help to respond to (comments 3.3.3, 3.3.5, 3.4, 3.11, and any others that you would like to provide input on). Anything you can provide to help us respond would be most appreciated. If you have any questions or concerns, please feel free to contact Meredith Laws or myself. Thanks.

- Dan Kenny 305-7546



13544

R137669

**Chemical:** Sulfuryl fluoride

**PC Code:**

078003

**HED File Code:** 71300 BEAD Response to Comments

**Memo Date:** 6/14/2005

**File ID:** DPD316797

**Accession #:** 000-00-0116

**HED Records Reference Center**

1/8/2007